UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK	Ţ
THE UNITED STATES OF AMERICA,	NOTICE OF MOTION
-against-	ORAL ARGUMENT REQUESTED
	23 Cr. 10 (RMB)
AVRAHAM EISENBERG,	
Defendant.	X.
PLEASE TAKE NOTICE that, upon the acco	•

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law, Affidavit, Declaration, and records of the above-captioned case, defendant Avraham Eisenberg through his counsel moves the Court in an omnibus motion (per the Court's order) for an order:

- I. DISMISSING THE INDICTMENT; and
- II. SUPPRESSING ALL EVIDENCE RECOVERED FROM DEFENDANT'S PERSON AND FROM HIS ELECTRONIC DEVICES.

and for such other and further relief as this Court may deem just and proper.

Dated: July 28, 2023 Respectfully submitted,

Brian E. Klein

Brian E. Klein Ashley E. Martabano Waymaker LLP 515 S. Flower Street, Suite 3500 Los Angeles, California 90071 (424) 652-7800

Sanford Talkin

Sanford N. Talkin Noam B. Greenspan Talkin, Muccigrosso & Roberts, LLP 40 Exchange Place, 18th Floor New York, New York 10005 (212) 482-0007

Attorneys for defendant Avraham Eisenberg